## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA ERIE DIVISION

UNITED STATES OF AMERICA, ex rel.	)	
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,	)	
V. RAO NADELLA, M.D., and	)	
MARTIN JACOBS, M.D.,	)	
DI 1 1 100	)	CWW A COVEN NO. 04 10 CF
Plaintiffs,	)	CIVIL ACTION NO. 04-186E
V	)	
V.	)	
	)	
BRADFORD REGIONAL MEDICAL CENTER,	)	Judge Cohill
V & S MEDICAL ASSOCIATES, LLC,	)	-
PETER VACCARO, M.D.,	)	
KAMRAN SALEH, M.D.,	)	
and DOES I through XX,	)	
	)	
	)	
Defendants.	)	

## MOTION FOR ADMISSION PRO HAC VICE

Plaintiffs hereby move for the admission, pro hac vice, of G. Mark Simpson, Bothwell & Simpson, P.C. as additional counsel for Plaintiffs-Relators Dilbagh Singh, M.D., Paul Kirsch, M.D., V. Rao Nadella, M.D., and Martin Jacobs, M.D. As set forth in the accompanying Declaration of G. Mark Simpson, Mr. Simpson is currently an attorney in good standing admitted to the United States Courts of Appeal for the Eleventh, Sixth, and D.C. Circuits; the United States District Courts for the Northern and Middle Districts of Georgia; the Georgia Supreme Court; the Georgia Court of Appeals; and all trial courts in the State of Georgia. Accordingly, Plaintiffs respectfully request that the Court admit Mr. Simpson pro hac vice as additional counsel for Plaintiffs in this case.

This 26th day of August, 2005.

Respectfully submitted,

By: <u>/S/ Andrew M. Stone</u> Andrew M. Stone, Esquire (Pa. #35176) STONE & STONE 828 Frick Bldg. 437 Grant Street. Pittsburgh, Pa. 15219

Phone: (412) 391-2005 Fax: (412) 391-0853

Attorneys for the Plaintiffs/Relators

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of August, 2005, I caused a copy of the Plaintiff's Motion for Admission Pro Hac Vice, and proposed order, to be filed electronically and/ or served by first-class mail, postage prepaid, on:

Jay D. Marinstein, Esq. Robert L. Eberhardt, Esq. United States Attorney's Office Carl J. Rychcik, Esq. Fox Rothschild L.L.P. Civil Division 625 Liberty Avenue USPO & Courthouse 29<sup>th</sup> Floor Pittsburgh, Pa. 15219 Pittsburgh, Pa. 15222-3115

Daniel M. Mulholland III, Esq. Michael Granston, Esq. Henry M. Casale, Esq. U.S. Department of Justice Horty Springer & Mattern, P.C. Commercial Litigation Branch 4614 Fifth Avenue P.O. Box 261 Pittsburgh, Pa. 15213 Ben Franklin Station Washington, D.C.

/S/ Andrew M. Stone